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VIA HAND DELIVERY

October 19, 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

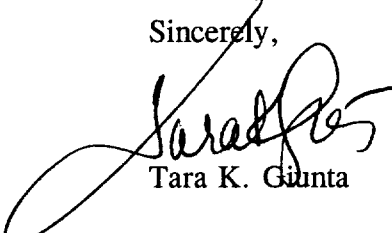
Reference: CC Docket No. 94-102
Subject: Reply Comments

Dear Ms. Salas:

Enclosed please find an original and 9 copies of Corsair Communications, Inc.'s (Corsair) Reply Comments in the proceeding referenced above, pursuant to the Federal Communications Commission's request for additional comment regarding the *ex parte* presentation filed by the Ad Hoc Alliance for Public Access to 911 on September 17, 1998. Also enclosed is a copy to be time stamped.

Should you have any questions, please feel free to contact the undersigned.

Sincerely,


Tara K. Giunta

TKG:clz
Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced)	RM 81-43
911 Emergency Calling Systems)	

Reply Comments of Corsair Communications

Corsair Communications, Inc. ("Corsair") submits its Reply Comments in the above-captioned proceeding pursuant to the Commission's request for additional comment regarding the *ex parte* presentation filed by the Ad Hoc Alliance for Public Access to 911 ("Ad Hoc Alliance") on September 17, 1998.¹

I. INTRODUCTION

Corsair is a leading provider of distributed systems solutions to the wireless industry. The company provides a variety of wireless products and services, including the PhonePrint™ fraud prevention system and the PhoneCheck™ wireless performance monitoring system, which enables carriers to reduce customer churn and optimize network performance. Corsair hardware and software is currently deployed in thousands of cell sites and is in use in over 160 markets worldwide.

PhoneTrack™ is Corsair's newest product and uses proprietary time difference of arrival and other technologies to determine the location of wireless devices, consistent with the Commission's Phase II Automatic Location Identification ("ALI") requirements.² Specifically,

¹ *Additional Comment Sought, Wireless 911 "Strongest Signal" Proposal Filed by Ad Hoc Alliance for Public Access to 911, Public Notice*, CC Docket No. 94-102, DA 98-1936, Sept. 22, 1998.

² See 47 C.F.R. § 20.18(e).

PhoneTrack will: (1) forward location information immediately to emergency services personnel at public safety answering points (“PSAPs”); (2) offer wireless carriers the ability to identify the latitude and longitude of mobile units making 911 calls within a radius of no more than 125 meters; and (3) be available in the United States in 1999, well in advance of the Commission’s mandated timeline for deployment of Phase II requirements.³

Corsair highlights that commenters do not challenge the inherent value of ALI. Corsair opposes the Ad Hoc Alliance’s proposal that the Commission adopt additional technical requirements at this late date, because doing so would thwart the prompt and timely deployment of valuable E-911 location systems, and may be detrimental to the Commission’s public safety goals. To safeguard these goals, the Commission should continue to require that wireless carriers meet Phase II requirements by the 2001 deadline and not introduce any further requirements which may delay this deadline from being met by wireless carriers.

II. The Provision of ALI in a Timely Manner is a Cornerstone of the Commission’s Public Safety Goals and Policies

In its E-911 Order, the Commission defined two very important public interest objectives: (1) 911 call completion, and (2) prompt deployment of enhanced wireless 911 functions, such as location technology, to enable the rapid and accurate dispatch of emergency services to people in need.⁴ The Commission has stated that “ALI will bring important safety benefits to all wireless customers and to the community.”⁵ On reconsideration, the Commission declined to further delay the implementation of the Phase II ALI requirements in light of the importance of providing location information during emergencies. The Commission reasoned that delaying the

³ As of October 1, 2001, licensees must be able to provide to designated PSAPs the location of all 911 calls by longitude and latitude such that the accuracy for all calls is 125 meters or less using a Root Mean Square (“RMS”) methodology. 47 C.F.R. § 20.18(e).

⁴ In the Matter of Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 18676, ¶ 2 (1996) (“E-911 Order”).

⁵ Id. at ¶ 61.

Phase II implementation schedule “would not be in the public interest and could unnecessarily delay the benefits of location technology.”⁶

The provision of ALI services is a cornerstone of the Commission’s mission to expeditiously deploy enhanced 911 features that enable fast and accurate emergency response to people in need. Accurate location information permits PSAPs to rapidly respond to emergencies, by allowing immediate dispatch of assistance. Moreover, deployment of ALI reduces the likelihood of errors in reporting the location of an emergency situation. The Commission should refrain from any action that requires, either *de jure* or *de facto*, a delay in the implementation of ALI technology and, hence, undermines the Commission’s public safety objectives.

III. The Strongest Signal Proposals Undermine the Rapid Deployment of ALI Technologies

Corsair agrees with the majority of commenters in this proceeding that both of the Ad Hoc Alliance’s proposals related to the strongest signal should be rejected.⁷ As aptly noted by CTIA, “the Ad Hoc Alliance has distracted and delayed the FCC and wireless industry from completing the important work of this docket.”⁸

The E-911 docket is rife with technical arguments regarding the feasibility of the strongest signal and, now, the new “adequate signal” proposals.⁹ Aside from these debates that have been monopolizing standards and technical groups for months, it is clear that the strongest

⁶ In the Matter of Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Memorandum Opinion and Order, 12 FCC Rcd 22665, ¶ 122 (1997) (“E-911 MO&O”).

⁷ See Comments of AT&T Wireless Services, Inc.; Comments of BellSouth Corp.; Comments of Bell Atlantic Mobile, Inc.; Comments of Ameritech Mobile Communications, Inc.; Comments of United States Cellular Corporation; Comments of the Rural Telecommunications Group; Comments of the Cellular Telecommunications Industry Association (“CTIA”).

⁸ Comments of CTIA at 5.

⁹ See, e.g., Comments of AirTouch Communications Inc. at 4-5; Comments of SBC Wireless Inc. at 3-7; Comments of CTIA at 8-10.

signal proposals undermine the Commission's important objective of ensuring accurate and reliable location information by focusing merely on one aspect of a call — the signal strength. Requiring either all wireless 911 calls or wireless 911 calls that do not have an "adequate signal" to use the wireless system with the strongest signal in fact reduces the accuracy of location information. This is because these proposals would direct 911 calls to systems with the strongest signal, regardless of whether other systems in the area offer more accurate location information.

This outcome undermines the rapid deployment of ALI in two ways. First, customers are deprived of the ability to choose a carrier that has implemented location technology — a choice many customers may pay for and rely upon when making a 911 call. Second, carriers will be discouraged from investing in the early deployment of location technology, absent the ability to use this feature as a distinguishing aspect of their service.

In a national survey sponsored by CTIA last year, 63% of wireless phone customers polled cited emergency use as the best reason to own a wireless phone.¹⁰ Clearly, access to emergency services is important to the public at large. The Commission has already provided a comprehensive framework to guide carriers and PSAPs in implementing E-911 and a reasonable timeframe within which to do so. Four years since the issuance of the Notice of Proposed Rulemaking in this docket, the Commission is still weighing the technical details and considering imposing non-technology neutral mandates. Instead, the Commission should allow the marketplace to determine which technologies will best serve the public and encourage the market forces that are driving early deployment of E-911 features such as location technologies.¹¹

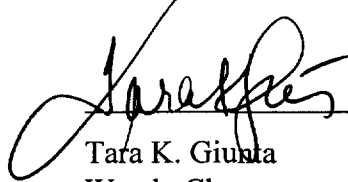
¹⁰ Public Opinion Strategies, National Survey, July 31- Aug. 4, 1997, <www.wow-com.com/professional/hwysafety/reference/e911poll.cfm>.

¹¹ In August 1998, CTIA hosted a Phase II Location Technology conference in which more than one dozen location technology companies, including Corsair, presented their products and timeframes for deployment. The location technology business is a positive example of how public policy objectives can energize the marketplace and encourage innovation. A study by the Strategis Group predicts demand for value-added wireless location services could reach as high as \$8 billion annually with the largest slice, or 52 percent, coming from the information and emergency services sector. Lynette Hazelton, *TruePosition Gets a Fix on Emergency Calls*, Philadelphia Business Journal, Sept. 5, 1997, at B6.

IV. CONCLUSION

For the reasons stated above, the Commission should reject the Ad Hoc Alliance's strongest signal proposals. Adoption of such a requirement would only undermine the Commission's public safety goals by further delaying implementation of the Phase II E-911 requirements. To safeguard these goals, the Commission should refrain from introducing any unnecessary additional requirements which may delay carriers from meeting the Phase II deadline.

Respectfully submitted,

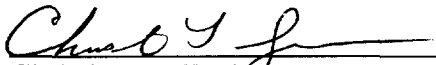
A handwritten signature in black ink, appearing to read "Tara K. Giunta", is written over a horizontal line.

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Counsel for Corsair Communications, Inc.

David G. Thompson
Vice President, Marketing
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Certificate of Service

I, Christine L. Zepka, hereby certify that I have on this 19th day of October, 1998, served copies of the foregoing Reply Comments of Corsair Communications, Inc., by first-class mail, postage prepaid, or otherwise hand-delivered to the parties below.


Christine L. Zepka

Dated October 19, 1998

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